

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

Christopher W. Hyde (8668)
Attorney-at-Law
One Overlook Road
Newton, NJ 07860
(862) 324-0028
Attorney for Deborah E. Kelly

In the Matter of)	
)	Case No. 14-16190
)	
KEVIN D. KELLY,)	Notice of Motion for
)	Relief from Stay, to Confirm
)	Power of Attorney, and for
)	Counsel fees and costs
Debtor)	
)	

TO:
Stephen B. McNally, Esq.
Attorney for Debtor
McNally & Associates, LLC
93 Main Street, Suite 201
Newton, NJ 07860

Jay Lubetkin, Esq. Trustee
Rabinowitz, Lubetkin & Tully
293 Eisenhower Parkway
Suite 100
Livingston, NJ 07039

GENTLEMEN: PLEASE TAKE NOTICE that the undersigned, attorney for DEBORAH E. KELLY, a creditor named in the above-entitled action, will make application, on the 9th day of June, 2014, before the United States Bankruptcy Court for the District of New Jersey, at the United States Courthouse, Courtroom 3A, Newark, Market Street, Newark, New Jersey for an ORDER for relief from the automatic stay provisions of the United States Bankruptcy Code in the above entitled action, for the Bankruptcy Court's Confirmation of a certain Power of Attorney to sell certain jointly owned/jointly mortgaged real

property and authorization to complete all documents in connection with the short sale of the same, and for counsel fees and costs; and

PLEASE TAKE FURTHER NOTICE that in support of said application, movant shall rely upon the annexed Certification of Deborah E. Kelly, and the letter memorandum submitted herewith; and

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is being submitted herewith; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested on this motion in the event that Debtor files opposition.

Yours, etc.

A handwritten signature in blue ink, appearing to read "C. Hyde", with a horizontal line extending to the right.

Christopher W. Hyde 8668
Attorney for Deborah E. Kelly

May 9, 2014